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# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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May 10, 1999

Commander  
Atlantic Division  
Naval Facilities Engineering Command  
1510 Gilbert Street (Building N-26)  
Norfolk, Virginia 23511-2699

Attn.: Mr. T. A. Reisch, IRP  
Code 18225

RE: Draft-Final Technical Memorandum for the  
Groundwater Sampling at SWMU 24  
Oceana Naval Station, Virginia Beach, Virginia  
April 1999

Dear Mr. Reisch:

Thank you for the opportunity to review the above document. The Department's comments are listed below.

1. Table 2-4 - The Department is concerned with the difference in concentrations between the CSL and Laboratory samples from the locations PZ3S and PZ3D. Please provide a further discussion of these variations which would assist in evaluating whether the CSL data is reliable.
2. The data suggests two additional source points, one in the vicinity of MW-3, and another in the vicinity of GW51.

Since there were no organic "hits" at MW-5 it would suggest that either the "source" is down or cross gradient from MW-5 and near to GW51, or that MW-5 results are an anomaly. Additional data may be needed in this area to further clarify the extent of contamination at this point.

No DPT samples were obtained in the vicinity of MW-3. However, a significantly higher concentration of cis 1,2-DCE was detected in this well than in the DPT samples

Oceana, SWMU-24

May 10, 1999

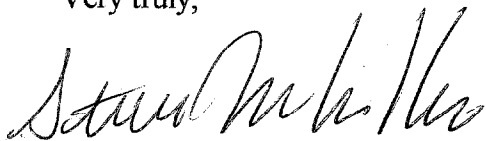
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up and cross gradient. Additional data is needed in this area to determine if there is another "source" for this location and the extent of the contamination in the western and southwestern directions.

3. The last sentence on page 3-1 states that groundwater flows to the south and southwest. Figure 2-6 shows the ground water to be moving to the southeast.
4. The Department would like to meet with your technical staff to discuss the issues raised above and the proposed use of Monitored Natural Attenuation (MNA) and localized groundwater remediation prior to development of these work plans. Substantial data relating to physical, and non-contaminant chemical and biological characteristics of the localized area and its subsurface structure will be required for modeling of MNA and for treatment system design.
5. The Department requests a copy of all human health and ecological risk assessments. The Department may wish to review these documents in conjunction with or independently of EPA. In general, the Department requires that a residential scenario, with resident consumption and use of groundwater as one of the scenarios to be evaluated in the risk assessment. It would be advisable to discuss the requirements for the risk assessment with department staff prior to submitting the work plan. This should expedite final approval of the risk assessment.

If you have any questions, please contact Ms. Sharon Wilcox at 804-698-4143. We look forward to meeting with you on June third and fourth for the RAB meeting here in Richmond.

Very truly,



Steve Mihalko  
Project Officer

CC: Bob Stroud, Region III, EPA  
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